
TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 95OPYU060
to be issued to:

Southern Star Central Gas Pipeline, Inc.
Yuma Station
Yuma County
Source ID 1250017

Geoffrey D. Drissel Review Engineer
Revised for Renewal July 5, 2007

I. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued November 1, 1997. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted April 27, 2007. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

II. Source Description

This source is classified as a natural gas transmission facility defined under Standard Industrial Classification 4922. Gas is compressed to specification for transmission to sales pipelines using a single internal combustion engine powering four (4) compressor units. The only other activity on site is an emergency shutdown device (ESD), used to release natural gas to the atmosphere in an emergency, and fugitive VOC emissions.

The facility is located just outside of the rural town of Yuma in Yuma County, Colorado. The area is designated as attainment for all criteria pollutants. Kansas is designated as an affected state located within a 50 mile radius of the facility. There are no Federal Class I areas within 100 kilometers of the facility. This source is minor with respect to Prevention of Significant Deterioration (PSD) requirements where PSD is triggered at 250 TPY of an attainment criteria pollutant. Facility wide emissions are as follows:

Pollutant	Potential To Emit (TPY)	2005/2006 Actual Emissions (TPY)
NO _x	239.9	90.5
CO	26.1	9.8
VOC	13.1	5.1

Potential emissions are taken from the existing Operating Permit for this facility. Actual emissions are taken from the 12 month rolling emission totals reported during a facility inspection on July 7, 2006. The Division assumes that emissions from the facility have remained the same or decreased from the levels listed. This facility is not a major source of HAPs and, consequently, it is not subject to either Subpart HH or Subpart HHH of the National Emission Standards for Hazardous Air Pollutants.

III. Discussion of Modifications Made

Source Requested Modifications

The source did not request any changes to the permit in their renewal application.

Other Modifications

Although the source did not request any changes to their permit in their renewal application, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal. These changes are as follows:

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The company address was revised to reflect the most current information.

Section I - General Activities and Summary

The language in Condition 1.4 was changed to include General Conditions 3d and 3g (last paragraph) on the list of State-only enforceable conditions.

The language in Condition 3.1 was revised to reflect changes in the regulation citations.

Section II - Specific Permit Terms

The following changes were made to the specific requirements of Unit

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.
- The emission calculation language was revised to reflect the current version.
- The portable monitoring language was revised to reflect the current version.

Section III – Permit Shield

- The citation at the beginning of Section III was updated.

Section IV - General Conditions

- The General Conditions were updated to reflect the most current version, including Conditions 3, 21 and 22.

Appendices

- Appendix B and C were replaced with revised Appendices.
- The EPA addresses in Appendix D were revised